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Attorney for Defendant  
ROBERT CRIST

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
Plaintiff,

vs.

ROBERT CRIST  
Defendant.

) Case No. 2:22-cr-00229-DJC

) STIPULATION AND ORDER TO CONTINUE  
) STATUS CONFERENCE

) Date: June 29, 2023

) Time: 9:00 a.m.

) Judge: Hon. Daniel J. Calabretta

IT IS HEREBY STIPULATED by and between Phillip A. Talbert, United States Attorney, through Assistant United States Attorney Emily Sauvageau, attorney for Plaintiff and Federal Defender Heather E. Williams through Assistant Federal Defender Hannah R. Labaree, attorney for ROBERT CRIST, that the status conference, currently scheduled for June 29 2023, be continued to August 17, 2023 at 9:00 a.m.

To date, the government has produced approximately 338 Bates-stamped items in discovery. The government is awaiting additional DEA lab results, which it will then produce to defense counsel in discovery. These lab results will allow the parties to discuss potential application of the Sentencing Guidelines to this case.

Defense counsel requires additional time to review the discovery, conduct legal research related to the application of sentencing law to Mr. Crist's case, meet with her client, and conduct independent investigation. The parties therefore request a T4 exclusion of time for defense investigation until August 17, 2023.

1 Based upon the foregoing, the parties agree time under the Speedy Trial Act should be  
2 excluded from this order's date through and including August 17, 2023; pursuant to 18 U.S.C.  
3 §3161 (h)(7)(A) and (B)(iv)[reasonable time to prepare] and General Order 479, Local Code T4  
4 based upon continuity of counsel and defense preparation.

5 Dated: June 23, 2023

6 HEATHER E. WILLIAMS  
Federal Defender

7  
8 /s/ Hannah R. Labaree  
HANNAH R. LABAREE  
Assistant Federal Defender  
Attorney for Defendant  
9 ROBERT CRIST  
10

11 Dated: June 23, 2023

12 PHILLIP A. TALBERT  
United States Attorney

13 /s/ Emily Sauvageau  
EMILY SAUVAGEAU  
Assistant U.S. Attorney  
Attorney for Plaintiff  
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**ORDER**

IT IS HEREBY ORDERED, the Court, having received, read, and considered the parties' stipulation, and good cause appearing therefore, adopts the parties' stipulation in its entirety as its order. The Court specifically finds the failure to grant a continuance in this case would deny counsel reasonable time necessary for effective preparation, taking into account the exercise of due diligence. The Court finds the ends of justice are served by granting the requested continuance and outweigh the best interests of the public and defendant in a speedy trial.

The Court orders the time from the date the parties stipulated, up to and including June 29, 2023, shall be excluded from computation of time within which the trial of this case must be commenced under the Speedy Trial Act, pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B)(iv) [reasonable time for counsel to prepare] and General Order 479, (Local Code T4). It is further ordered the June 29, 2023 status conference shall be continued until August 17, 2023, at 9:00 a.m.

Dated: June 23, 2023

/s/ Daniel J. Calabretta

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THE HONORABLE DANIEL J. CALABRETTA  
UNITED STATES DISTRICT JUDGE